

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME FOR GOOGLE TO SUBMIT
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION TO SEAL (DKT.
360)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 6-2, I submit this declaration in support of the Joint
7 Stipulation and [Proposed] Order Extending Time For Google To Submit Declaration In Support of
8 Plaintiffs’ Motion to Seal (Dkt. 360) (“Stipulation”).

9 3. On December 20, 2021, Plaintiffs filed their Administrative Motion to Seal Portions
10 of Plaintiffs’ Motion to Seal Documents Pursuant to Dkt. 358 (Dkt. 360).

11 4. On December 26, 2021, Google received unredacted copies of Plaintiffs’ unredacted
12 documents and transcript excerpts cited in Dkt. 357 under seal and submitted with Dkt. 360.

13 5. Pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the
14 Designating Party, to establish that such designated material is sealable, is by Monday, December
15 27, 2021.

16 6. On December 27, 2021, the Parties agreed that an extension of time of 7 days will
17 provide Google with sufficient time to review the materials in Plaintiffs’ Motion that Google
18 designated as confidential and to submit its declaration in support its designated material in the
19 filings (Dkts. 357, 358, 360).

20 7. The Court has previously modified the case schedule by extending Plaintiffs’
21 deadline to file a brief response to the affidavit and declaration submitted in response to the Court’s
22 request (Dkt. 110), the deadline special master submissions (Dkt. 206), and also granted parties’
23 stipulation to extend time to answer the complaint (Dkt. 42), to submit protective order and ESI
24 order (Dkt. 72), to extend time for submitting motion to dismiss briefing (Dkt. 73), to submit
25 proposed redactions to the April 27, 2021 hearing transcript (Dkt. 163) and June 2, 2021 hearing
26 transcript (Dkt. 246), to set a briefing schedule for Google’s motion to dismiss counts six and seven
27 of the Second Amended Complaint (Dkt. 175), to continue discovery deadlines (Dkt. 261), and to
28 extend time for Google to submit a declaration in support of plaintiffs’ motion to seal (Dkt. 294).

1 8. The 7-day extension will not affect the schedule in this case.

2
3 I declare under penalty of perjury of the laws of the United States that the foregoing is true
4 and correct. Executed in San Francisco, California on December 27, 2021.

5
6 DATED: December 27, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

7
8 By /s/ Jonathan Tse
Jonathan Tse

9 *Attorney for Defendant*